

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

**UNITED STATES OF AMERICA**

**v.**

**WILLIAM SOTO,**

**Defendant.**

) Criminal No. 5:24-CR-156 (FJS)

) **Indictment**

) Violation: 18 U.S.C. § 641  
) [Theft of Government  
) Property]

) 12 Counts and Forfeiture Allegation

) Counties of Oneida, Onondaga,  
) Offense: Oswego,

**THE GRAND JURY CHARGES:**

**COUNTS 1-12**

**[Theft of Government Property]**

On or about each of the dates set forth below, in the county set forth below, in the Northern District of New York, the defendant, **WILLIAM SOTO**, willfully and knowingly did embezzle, steal, purloin, and knowingly converted to his own use property and things of value of the United States, that is United States Postal Service postage stamps, the value of such property exceeded \$1,000:

<b>Count</b>	<b>Date of Theft</b>	<b>Location</b>	<b>Amount</b>
1	August 10, 2023	Utica, Oneida County, New York	\$2,428.80
2	August 10, 2023	Rome, Oneida County, New York	\$1,980.00
3	August 10, 2023	New Hartford, Oneida County, New York	\$2,640.00
4	August 10, 2023	Washington Mills, Oneida County, New York	\$1,320.00

5	August 10, 2023	Westmoreland, Oneida County, New York	\$1,980.00
6	August 10, 2023	Utica, Oneida Count, New York	\$2,141.04
7	August 10, 2023	Marcy, Oneida County, New York	\$3,300.00
8	August 11, 2023	Oswego, Oswego County, New York	\$1,980.00
9	August 11, 2023	Minetto, Oswego County, New York	\$9,438.00
10	August 11, 2023	Teall, Onondaga County, New York	\$1,320.00
11	August 11, 2023	Syracuse, Onondaga County, New York	\$1,320.00
12	August 11, 2023	Syracuse, Onondaga County, New York	\$1,254.00

All in violation of Title 18, United States Code, Section 641.

### **FORFEITURE ALLEGATION**

The allegations contained in Counts One through Twelve of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 641, the defendant, **WILLIAM SOTO**, shall forfeit to the United States of America any property, real and personal, which constitutes and is derived from proceeds traceable to said violation. The property to be forfeited includes, but is not limited to:

- 1) A money judgment in an amount equal to the missing proceeds from the offenses set forth in Counts One through Twelve.

### **Substitute Assets Provision**

If any of the property described above, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

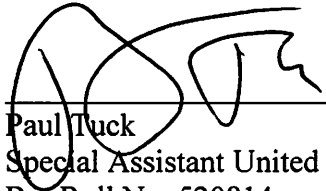
Dated: 3/27/24

A TRUE BILL, \*NAME REDACTED\*

  
Grand Jury Foreperson

Carla B. Freedman  
United States Attorney

By:

  
Paul Tuck  
Special Assistant United States Attorney  
Bar Roll No. 520814